

Steve Schulte (TX Bar No. 24051306)
Appearance Pro Hac Vice
John Raggio (CA Bar No. 338261)
Arati Furness (CA Bar No. 225435)
NACHAWATI LAW GROUP
5489 Blair Road
Dallas, Texas 75231
Telephone: (214) 890-0711
Fax Number: (214) 890-0712
Email: schulte@ntrial.com
Email: jraggio@ntrial.com
Email: afurness@ntrial.com

Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF STEVEN S.
SCHULTE IN SUPPORT OF
NACHAWATI LAW GROUP
PLAINTIFFS' OPPOSITION TO
DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S MOTION TO DISMISS CASES
FOR FAILURE TO COMPLY WITH
AMENDED PTO 10**

This Document Relates to:

*Jane Doe NLG (A.D.) v. Uber Technologies, Inc.,
et al., No. 3:25-cv-07407-CRB*

*Jane Doe NLG (A.H.) v. Uber Technologies, Inc.,
et al., No. 3:25-cv-07400-CRB*

*Jane Doe NLG (D.L.) v. Uber Technologies, Inc.,
et al., No. 3:25-cv-07478-CRB*

*Jane Doe NLG (J.D.) v. Uber Technologies, Inc.,
et al., No. 3:25-cv-07482-CRB*

*Jane Doe NLG (J.L.) v. Uber Technologies, Inc.,
et al., No. 3:25-cv-07545-CRB*

*Jane Doe NLG (L.F.) v. Uber Technologies, Inc.,
et al., No. 3:25-cv-07542-CRB*

Judge: Honorable Charles R. Breyer
Date: January 16, 2026
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

Jane Doe NLG (L.R.) v. Uber Technologies, Inc., et al., No. 3:25-cv-07423-CRB

Jane Doe NLG (N.T.) v. Uber Technologies, Inc., et al., No. 3:25-cv-07540-CRB

Jane Doe NLG (R.H.) v. Uber Technologies, Inc., et al., No. 3:25-cv-07403-CRB

Jane Doe NLG (S.M.) v. Uber Technologies, Inc., et al., No. 3:25-cv-07543-CRB

Jane Doe NLG (T.P.) v. Uber Technologies, Inc., et al., No. 3:25-cv-07484-CRB

Jane Doe NLG (V.M.) v. Uber Technologies, Inc., et al., No. 3:25-cv-07467-CRB

Jane Doe NLG (M.P.) v. Uber Technologies, Inc., et al., No. 3:25-cv-07312-CRB

DECLARATION OF STEVEN S. SCHULTE

I, Steven S. Schulte, declare as follows:

1. I am an attorney who is admitted *pro hac vice* to practice before this Court. I am a partner at the law firm Nachawati Law Group and counsel of record for the plaintiffs represented by Nachawati Law Group whose claims are the subject of Defendants' Motion to Dismiss. ECF No. 4491.
2. I make this declaration of my personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.
3. This declaration is made in support of Nachawati Law Group Plaintiffs' Opposition to Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Motion to Dismiss Cases for Failure to Comply with Amended Pretrial Order 10 ("PTO 10"). ECF No. 4491.

1 4. Despite significant efforts, including numerous phone calls, emails, texts, letters,
2 written communications, and full contact and address searches, our office has been
3 unsuccessful in connecting with certain Plaintiffs as to the verified Plaintiff Fact Sheets
4 that are the subject of Defendants' Motion.

5
6 5. Plaintiffs Jane Doe NLG (A.H.), Jane Doe NLG (D.L.), Jane Doe NLG (L.R.), Jane
7 Doe NLG (S.M.), and Jane Doe NLG (M.P.) have submitted and produced verified
8 Plaintiff Fact Sheets as required by Amended Pretrial Order No. 10, as of December
9 10, 2025. Counsel would therefore dispute their inclusion on Uber's list of
10 delinquencies, provided in their Motion, as well as respectfully request for their
11 exclusion on any future entry of dismissal by the Court.

12 Executed on December 10, 2025, in Dallas, Texas.

13
14 **NACHAWATI LAW GROUP**

15 /s/ Steven S. Schulte

16 Steven S. Schulte (TX SBN 24051306)